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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SCOTT STERLING, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS, BELINDA
NUCIFORA, DAVID BARTHOLOMEW,
CHRISTOPHER GUZOWSKI, and MICHAEL
ALFRED,

Defendants.

Case No. 2:22-cv-07273-JMV-MAH

**DECLARATION OF JAMES E.
CECCHI IN SUPPORT OF ERIK
KEYSER'S MOTION FOR
APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF COUNSEL**

I, James E. Cecchi, hereby declare as follows:

1. I am an attorney practicing with the law firm of Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., liaison counsel for Lead Plaintiff Movant Erik Keyser (“Keyser”) and proposed liaison counsel for the class in the above-captioned actions. I make this declaration in support of Keyser’s Motion for Appointment as Lead Plaintiff and Approval of Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached hereto as the exhibits are true and correct copies of the following:

Exhibit A: Press release published December 4, 2022 on *PR Newswire*, announcing the pendency of the securities class action against Defendants herein;

Exhibit B: Signed PSLRA Certification of Keyser;

Exhibit C: Analysis of Keyser’s financial interest;

Exhibit D: Firm résumé of Glancy Prongay & Murray LLP; and

Exhibit E: Firm résumé of Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed this 13th day of February 2022.

s/James E. Cecchi
James E. Cecchi